

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 1:06cr101-MHT
)	
MATTHEW OKONKWO)	

MOTION TO CONTINUE PRETRIAL CONFERENCE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and as grounds for the Motion to Continue, states as follows:

1. On May 26, 2006, counsel for the defendant filed a motion to withdraw based on a conflict of interest. New counsel has not yet been appointed.
2. Discovery in this conspiracy and tax fraud case comprised more than 1500 pages.
3. The undersigned AUSA will be unable to attend the pretrial conference as he is scheduled to be in South Carolina for Department of Justice training from May 31, 2006 through June 2, 2006.
4. The government submits that the pretrial conference will be more productive if there is a meaningful opportunity prior to the conference for defense counsel to review the discovery and for the AUSA and defense counsel to discuss the case.

WHEREFORE, the United States respectfully requests that this motion be GRANTED.

Respectfully submitted this the 30th day of May, 2006.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/Andrew O. Schiff
ANDREW O. SCHIFF
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334) 223-7280
Fax: (334) 223-7135
E-mail: andrew.schiff@usdoj.gov

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 1:06cr101-MHT
)	
MATTHEW OKONKWO)	

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to: Daniel G. Hamm, Esq.

Respectfully submitted,

/s/Andrew O. Schiff
ANDREW O. SCHIFF
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334)223-7280
Fax: (334)223-7135
E-mail: andrew.schiff@usdoj.gov